

# Exhibit A

UNITED STATES DISTRICT COURT  
NORTHERN DISTRICT OF NEW YORK

---

THE UNITED STATES OF AMERICA

*ex rel.*

FOX UNLIMITED ENTERPRISES, LLP

Plaintiff/Relator,

**Civ. No.: 1:19-cv-00914-FJS-CFH**

v.

TRIMARK USA, LLC, TRIMARK GILL  
GROUP, TRIMARK GILL MARKETING  
F/K/A GILL MARKETING, INC.  
GOVERNMENT SALES, LLC  
F/K/A GOVERNMENT SALES, INC.,  
JOHN DOES #1-50, FICTITIOUS NAMES,

Defendants.

---

**THE UNITED STATES' NOTICE OF CONSENT TO DISMISSAL**

Pursuant to the False Claims Act, 31 U.S.C. § 3730(b)(1), the United States hereby notifies the Court that the Attorney General consents to Plaintiff-Relator Fox Unlimited Enterprises, LLP's dismissal of claims asserted against Defendants Government Sales LLC and John Does #1-50 without prejudice to the rights of the United States, based on its determination that such a dismissal is commensurate with the public interest and that the matter does not warrant the continued expenditure of government resources to pursue or monitor the action based on currently available information.

The United States requests that Relator's Notice of Voluntary Dismissal Without Prejudice as to Defendants Government Sales LLC and John Does #1-50, this Notice, the Court's Order dismissing this action, and all subsequent filings in this action be unsealed. The United States requests that all other papers on file in this action remain under seal because in discussing the content and extent of the United States' investigation, such papers are provided by law to the Court alone for the

sole purpose of evaluating whether the seal and time for making an election to intervene should be extended.

A proposed order accompanies this notice.

Dated: November 18, 2024

CARLA B. FREEDMAN  
United States Attorney

/s/ Adam J. Katz  
Adam J. Katz  
Assistant United States Attorney  
Bar Roll No. 517894